

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MACHELLE SINGH, individually,

Plaintiff,

VS.

ALBERTSON'S LLC d/b/a ALBERTSONS, a foreign limited-liability company; DOES I through X; and ROE CORPORATIONS I through X, inclusive

Defendants.

**) Case 2:23-cv-00436-APG-VCF**

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY**  
**(Second Request)**

Plaintiff Machel Singh and Defendant Albertson's LLC, by and through their respective counsel of record, do hereby stipulate and agree to an extension of the discovery deadline, deadline for dispositive motions, and the pretrial order deadline in the current scheduling order and discovery plan in this matter for a period of sixty (60) days for the reasons explained herein.

Pursuant to Local Rule IA 6-1(a), the parties state that this is the second such discovery extension requested in this matter.

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**DISCOVERY COMPLETED TO DATE – LR 26-3(a)**

1. On July 22, 2022, Defendant served its initial list of witnesses and documents pursuant to Nev. R. Civ. P. 16.1(a).

2. On July 25, 2022, Defendant served written discovery on Plaintiff.

3. On July 27, 2022, Plaintiff served her initial list of witnesses and documents pursuant to Nev. R. Civ. P. 16.1(a).

4. On August 24, 2022, Plaintiff served her first supplement to her initial list of witnesses and documents pursuant to Nev. R. Civ. P. 16.1(a).

5. On August 24, 2022, Plaintiff served responses to Defendant's first set of written discovery.

6. On February 10, 2023, Defendant served its first supplement to its initial list of witnesses and documents pursuant to Nev. R. Civ. P. 16.1(a).

7. On February 23, 2023, Defendant took the deposition of Plaintiff Machel Singh.

8. On March 17, 2023, Plaintiff served her second supplement to her initial list of witnesses and documents, pursuant to Nev. R. Civ. P. 16.1(a).

9. On March 23, 2023, Defendant removed the case to Federal Court on the basis of diversity jurisdiction.

10. On April 6, 2023, Plaintiff served her first set of written discovery on Defendant.

11. On April 13, 2023, Plaintiff deposed the Fed. R. Civ. P. 30(b)(6) designee of Defendant.

12. On May 2, 2023, Defendant served responses to Plaintiff's first set of written discovery.

13. On May 5, 2023, Defendant served its third supplement to its initial disclosures pursuant to Fed. R. Civ. P. 26.

14. On August 8, 2023, Plaintiff served her third supplement to her initial list of witnesses and documents, pursuant to Fed. R. Civ. P. 26.

15. On October 10, 2023, the parties each served initial expert disclosures.

1 16. On November 7, Plaintiff took the deposition of Defendant's medical expert witness  
2 Michael McKenna, MD.

3 17. Defendant has noticed the deposition of Plaintiff expert David Bosch for November 20,  
4 2023.

5 **DISCOVERY REMAINING – LR 26-3(b)**

6 The parties request an extension to complete the following discovery:  
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- 8 1. Depositions of Plaintiff's treating providers/medical expert witnesses.  
9 2. Effectuation of out of state subpoenas for Plaintiff's prior medical providers relevant to  
10 pre-existing conditions.  
11 3. Depositions of Defendant's employees and fact witnesses.  
12 4. The parties are engaged in discussions for a potential resolution to the case.  
13

14 **REASONS FOR EXTENSION – LR 26-3(c)**

15 The parties have been diligently litigating this case and submit that good faith exists for an  
16 extension in this matter. An extension is warranted as Plaintiff's prior medical history is extensive,  
17 including treatment at multiple out of state medical providers. Defendant has encountered  
18 difficulty with the subpoena process for those providers and is working to remedy the issues  
19 surrounding discovery of the medical records. Further, the parties require more time to schedule  
20 and depose all necessary parties, some of which are employees of Defendants who pose  
21 scheduling difficulties given the upcoming holiday season. Finally, the parties are in discussions  
22 for a potential resolution of this case, and additional discovery is a means to that end. An  
23 additional 60-day extension is necessary to allow time for completion of the aforementioned  
24 discovery.  
25

26 The parties have acted in good faith. Neither party has any intent, nor reason, to delay the  
27 resolution of this matter.  
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**NEW DISCOVERY DEADLINES – LR 26-3(d)**

	Current Deadline	New Deadline
Amending Pleadings/Adding Parties	CLOSED	CLOSED
Initial Expert Disclosure	CLOSED	CLOSED
Rebuttal Expert Disclosure	CLOSED	CLOSED
Close of Discovery	December 11, 2023	February 9, 2024
Dispositive Motions	January 8, 2024	March 8, 2024
Joint Pretrial Order ( <b>if no dispositive motions are filed</b> – if dispositive motions are filed, the deadline for the filing of the Joint Pretrial Order will be suspended until 30 days after the decision the dispositive motions or further court order)	February 8, 2024	April 8, 2024

If an extension is granted, all additional discovery is anticipated to be concluded within the stipulated extended deadline. The parties represent that this request for an extension of discovery deadlines is made by the parties in good faith and not for an improper purpose.

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1           **IT IS SO STIPULATED** and agreed as to the terms and conditions of this Stipulation to  
2 Extend Discovery Deadlines.

3           DATED: November 8, 2023

DATED: November 8, 2023

4           AHLANDER INJURY LAW

BACKUS | BURDEN

5           /s/ Erik Ahlander

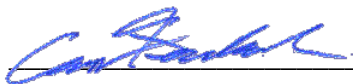
/s/ Dallin Knecht

6           M. Erik Ahlander, Esq.  
7           9183 W. Flamingo Road, Suite 130 Las  
8           Vegas, Nevada 89147 Attorney for  
9           Plaintiff

Jack P. Burden, Esq.  
Dallin Knecht, Esq.  
3050 S. Durango Dr.  
Las Vegas, Nevada 89117  
Attorneys for Defendant

9           **ORDER 2:23-cv-00436-APG-VCF**

10          **IT IS SO ORDERED**

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12          \_\_\_\_\_

13          United States Magistrate Judge

14                   11-16-2023

15          Dated: \_\_\_\_\_

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